

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL
EXPRESS MAIL & PRIORITY MAIL CONTRACT 5

Docket No. MC2009-18

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL CONTRACT 5
(MC2009-18)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-25

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(June 7, 2012)

In Order No. 1322, issued April 26, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until June 11, 2012. The Postal Service and the customer have continued to work diligently to reach a new agreement to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. The parties have now signed a new agreement and expect to file it with the Commission within the next two weeks. However, the signed contract still must proceed through the internal Postal Service review process before it can be filed with the Commission. Therefore, because of the timing of the regulatory process, the customer now faces the prospect of an interruption in its access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

To avoid this result, the Postal Service respectfully requests that the Commission grant an additional thirty-day extension to allow the existing contract to remain in effect. By that time, the Postal Service expects that it will have filed the successor contract with the Commission, and the Commission would then be able to complete its regulatory review. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days beyond the June 11 termination date.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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